

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA) Case No.: 2:21-MJ-00173-EJY
Plaintiff,) Dept.: 7D
vs.)
KEN FREEMAN) **STIPULATION AND ORDER FOR**
Defendant.) **DISMISSAL**
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IT IS HEREBY STIPULATED by and between Defendant, KEN FREEMAN by and through his attorney of record, GEORGE E. CROMER, ESQ., and the Plaintiff, UNITED STATES OF AMERICA, by and through their attorney of record, RACHEL KENT, ESQ., that the Parties have agreed to resolve the case between them by way of a Diversion Agreement.

WHEREAS, that Defendant has completed the misdemeanor offense of Count One - Interfering with Lawful Used by Force/Threat/Intimidation, in violation of Title 43, Code of Federal Regulations Section 4140.1(b)(7), a Class A misdemeanor; and Count Two - Failure to Obtain Permit/Commercial, in violation of Title 43, Code of Federal Regulations, Section 2932.57(a)(1), a Class A misdemeanor now, therefore,

WHEREAS, Defendant did not enter Bureau of Land Management public land in the Primm area for the six (6) month period.

WHEREAS, the Defendant did not violate any local, state or federal laws.

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1 **IT IS HEREBY STIPULATED AND AGREED**, the Parties stipulate and that this
2 Court enters a dismissal of Plaintiff's Complaint in United States District Court Case No. 2:21-
3 MJ-00173-EJY.

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5 **IT IS SO STIPULATED.**

6 GEORGE E. CROMER, ESQ.

7 CHRISTOPHER CHIOU, ESQ.
U.S. ATTORNEY'S OFFICE

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9 */s/ George E. Cromer*
10 George E. Cromer, Esq.
Nevada Bar No. 000183
11 601 South 1th Street
Las Vegas NV 89101
12 Attorney for Defendant
13 Dated: 10/13/2021

/s/ Rachel Kent
14 Rachel Kent, Esq.
501 Las Vegas Blvd. South
Las Vegas NV 89101
15 Attorney for Plaintiff
Dated: 10/13/2021

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17 **ORDER**

18 Based upon the foregoing Stipulation and for good cause appearing:

19 **IT IS HEREBY ORDERED** that pursuant to the Stipulation for Dismissal, Plaintiff's
20 Complaint in United States District Court Case No. 2:21-MJ-00173-EJY is hereby dismissed
21 with prejudice as to Defendant KEN FREEMAN. Each Party shall bear their own costs and fees,
22 except as otherwise set forth in the Petty Offense Diversion Agreement.

23 IT IS SO ORDERED.

24 Dated this 13th day of October, 2021.

25 *Leayna J. Zouchah*
U.S. MAGISTRATE JUDGE